

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

GD DEAL HOLDINGS, LLC

Plaintiff,

v.

SURINDER MULTANI; ABBE PROPERTIES,
LLC; SAPPHIRE SUPPLY, LLC; JCG
INVESTMENTS, LLC; ABBE CAPITAL AND
LEASING, LLC; ABBE MANAGEMENT
GROUP, LLC; FIFTH THIRD BANK;
CITIBANK; VENDOR CAPITAL GROUP;
BABAJIPS, LLC; CAPITAL ACCESS &
INVESTMENTS, LLC; PETROZONE
PETROLEUM II, INC.; G&S PORTAGE, INC.;
SAFANPREET MULTANI, in his capacity as
trustee for Gurpriya Kaur Multani Irrevocable
Trust; GURPAP SINGH MULTANI
IRREVOCABLE TRUST, and JAPVI SINGH
MULTANI IRREVOCABLE TRUST,

Defendants.

Civil Action No. 08-CV-1722

Judge Elaine E. Bucklo

**DEFENDANT CITIBANK'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER, MOVE, OR OTHERWISE RESPOND TO THE COMPLAINT**

Defendant Citibank hereby moves for an order extending the time by which it must answer, move, or otherwise respond to the complaint. In support of this motion, Defendant Citibank states as follows:

1. Plaintiff's complaint was filed on or about March 25, 2008. Citibank was served with a copy of the complaint by certified mail on or about March 27, 2008. Absent an extension of time, a responsive pleading would be due on April 16, 2008.

2. Citibank only recently retained Mayer Brown LLP to represent it in this action. In order to fully investigate the claims asserted in the complaint and to prepare an adequate

response thereto, Citibank requires additional time to answer, move, or otherwise respond to the complaint.

3. Counsel for Citibank spoke with counsel for Plaintiff GD Deal Holdings, Inc. on April 14, 2008 about the requested extension and counsel for Plaintiff GD Deal Holdings, Inc. has agreed to an extension of time up to and including May 16, 2008.

WHEREFORE, Defendant Citibank requests that the Court enter an order extending the time for Defendant Citibank to answer or otherwise move in response to the complaint until and including May 16, 2008.

Dated: April 15, 2008

Respectfully submitted,

/s/ Diane R. Sabol

Lucia Nale
Diane R. Sabol (6298369)
Nicole J. Highland (6291632)
MAYER BROWN LLP
71 South Wacker Drive
Chicago, IL 60606-4637
(312) 782-0600
drsabol@mayerbrown.com
Attorneys for Defendant Citibank

CERTIFICATE OF SERVICE

I, Diane R. Sabol, an attorney, hereby certify that on April 15, 2008, I caused a true and correct copy of the foregoing **DEFENDANT CITIBANK'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER, MOVE, OR OTHERWISE RESPOND TO THE COMPLAINT**, to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/ s/ Diane R. Sabol

Lucia Nale

Diane R. Sabol (6298369)

Nicole J. Highland (6291632)

MAYER BROWN LLP

71 South Wacker Drive

Chicago, IL 60606-4637

(312) 782-0600

drsabol@mayerbrown.com